

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
	§	
The State of Texas	§	CIVIL ACTION NO. 2:21-CV-
<i>ex rel.</i> ALEX DOE, Relator,	§	00022-Z
	§	
	§	Date: September 30, 2022
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
	§	
Defendants.	§	
	§	
	§	
	§	
	§	

**AFFILIATE DEFENDANTS’  
MOTION TO EXPEDITE BRIEFING OF AFFILIATE DEFENDANTS’ MOTION FOR  
CLARIFICATION OF THE COURT’S  
SEPTEMBER 20, 2022 ORDER [ECF 184]**

On September 30, 2022, Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc. (“Affiliate Defendants”) filed a Motion for Clarification of the Court’s September 20, 2022 Order. ECF 200. Affiliate Defendants are under the obligation to produce “full and complete responses” to Relator’s First RFP and are attempting to do so with all due swiftness, but require clarification regarding the scope of the Court’s September 20 Order. With awareness of their obligation and the rapidly approaching end of discovery, Affiliate Defendants respectfully request the Court order expedited briefing of this motion.<sup>1</sup>

### **Discussion**

As outlined in Affiliate Defendant’s Motion for Clarification, this Court issued its Order on Relator’s Motion to Compel on September 20, 2022 [ECF 184]. The underlying issues of the Motion to Compel have already been fully briefed by both sides, *see* ECF Nos. 154, 177, 180. Affiliate Defendants now merely request clarification on the scope of the Court’s Order to fulfill their discovery obligations as to Relator’s Requests for Production 10 and 11 and the scope of the Order as to Requests for Production 1 through 9. Under the Local Rules, Relator’s response to this motion would be due on September 21, 2022, and Affiliate Defendants’ reply would then be due on November 14, 2022. *See* N.D. Tex. L.R. 7.1(e). This Court has previously ordered expedited briefing for discovery disputes. *See* ECF No. 159. A speedy resolution of Affiliate Defendants’ motion will prevent any delays in Affiliate Defendants’ productions. Affiliate Defendants accordingly propose a schedule that would complete briefing on the motion for clarification in two weeks.

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<sup>1</sup> Affiliate Defendants have sought with Relator’s position on their motion to expedite the briefing schedule. At the time of filing, Relator has not responded, but Affiliate Defendants are nevertheless filing this in the interests of time.

**CONCLUSION**

For the foregoing reasons, Affiliate Defendants respectfully requests that the Court expedite briefing. Affiliate Defendants propose that the Court order the Relator to response to the Motion for Clarification by October 10, 2022, and Affiliate Defendants to file any reply by October 14, 2022.

Dated: September 30, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 30, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar